



CLOVER MEREDITH  
6445 SANTA FE RD  
WILSON OK 734636502

October 28, 2022

INSURED: CLOVER MEREDITH  
DATE OF LOSS: July 21, 2022  
CLAIM NUMBER: 0678009721 1JL

PHONE NUMBER: 630-972-7271  
FAX NUMBER: 855-219-7494  
OFFICE HOURS:

Dear Ms. Meredith,

At the time of your examination under oath on Friday, October 14, 2022, you produced a contents list. This contents list was attached to your examination as Exhibit No. 3. A copy of that contents list is attached to this letter. Although this contents list reflects acquisition of personal property with original cost of \$40,000 within one year of the fire, you produced no documentation at all corroborating the items on the contents list.

In our letter of October 11, 2022, fourteen categories of documents were requested. Almost every document you brought to the Examination had previously been produced to Allstate. You have produced no documents in response to most of the fourteen listed categories.

Accordingly, this letter constitutes Allstate's final request that you provide the following documents:

1. Any and all documents reflecting your ownership of the insured mobile home including but not limited to title, tag, registration, or purchase documents;
2. Any and all documents reflecting your purchase of the insured mobile home, including but not limited to payments, loans, financing, cash transfers, invoices, bills, bank records, notes, e-mails, texts, agreements, or contracts;
3. Any and all documents or communication of any type sent or received from the seller and reflecting any negotiation, offer, proposal, agreement, purchase, price, condition, payment, delivery, transport, or occupation, of the insured mobile home;
4. Any and all documents not already produced to Allstate reflecting the purchase of materials for refurbishing, repairing, remodel or improving the insured mobile home;
5. Any and all documents reflecting your payment for labor for work on the insured mobile home;
6. Any and all documents reflecting a lease or rental during 2022 of your home at 104 7th Street, Wilson, Oklahoma;
7. For any and all of your cell phones, the monthly statements from April through August, 2022;
8. Any and all documents or communications regarding transporting the insured mobile home to Texas;
9. Any and all documents reflecting the purchase of the personal property destroyed in the fire including invoices, bills, receipts, credit card statements, loans, financing, bank statements, manuals, warranties, etc.

In addition, based on your testimony during the partial examination under oath, it is further requested that you produce the following documents:

10. Any document reflecting a gift of any item on your contents list including receipts, invoices, shipping documents, letters, emails, confirmations, bank transactions, wire transfer documents, bank statements, cash transfers, etc.;
11. For the months of July, 2021 through July, 2022, each and every monthly statement from each of your accounts with any financial institution including, but not limited to, banks, credit unions, savings & loan institutions, cash applications, brokerage accounts and trust accounts;
12. Any and all documents reflecting a lease, rental or rental payments during 2022 of the house at 822 6th street, Wilson, Oklahoma.



As noted in the letter of October 11, 2022, your insurance policy provides as a condition that after a loss you must "give us all accounting records, bills, invoices and other vouchers, or certified copies, which we may reasonably request to examine and permit us to make copies."

The policy continues as follows:

"We have no duty to provide coverage under this section if you, an insured person, or a representative of either fail to comply with items a) through g) above, and this failure to comply is prejudicial to us."

Upon receipt of the documents listed in this letter, Allstate will consider whether to continue the examination under oath which you terminated. In the absence of production of documents, Allstate will conclude that you are refusing to comply with the above-referenced provision in the insurance policy.

In the absence of your compliance with this policy condition, Allstate may take this into consideration when determining your claim.

Sincerely,

*JOHN LYONS*

JOHN LYONS

630-972-7271

Allstate Vehicle and Property Insurance Company